

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

Case No. 15-mj-161

ANDREW PULLUM,
Defendant.

COMPLAINT FOR VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 641

BEFORE United States Magistrate Judge
Stephen L. Crocker

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

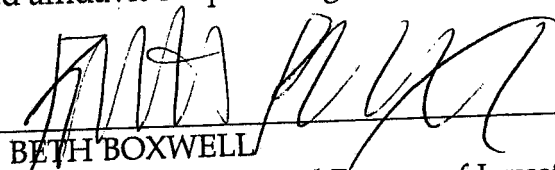
The undersigned complainant being duly sworn states: On or about December
17, 2015, in the Western District of Wisconsin, the defendant,

ANDREW PULLUM,

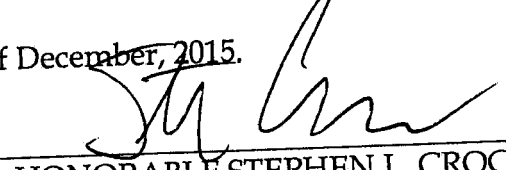
knowingly embezzled, stole, and converted to his own use, \$3950 in United States
Currency, which was the property of the United States Department of Justice,
Federal Bureau of Investigation, a department or agency of the United States.

(In violation of Title 18, United States Code, Section 641).

This complaint is based on the attached affidavit of Special Agent Beth Boxwell.


BETH BOXWELL
Special Agent, Federal Bureau of Investigation

Sworn to before me this 18th day of December, 2015.


HONORABLE STEPHEN L. CROCKER
United States Magistrate Judge

AFFIDAVIT

STATE OF WISCONSIN)

) ss.

SEALED

COUNTY OF DANE)

I, Beth Boxwell, being duly sworn on oath, deposes and states as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and I have been employed with the FBI for 11 years. I have participated in numerous investigations involving public corruption and narcotics cases.

2. The information contained in this affidavit is based upon my investigation and information provided by the Alcohol, Tobacco, Firearms, and Explosives (ATF) and Madison Police Department.

3. Based on the information described below, I believe that there is probable cause that Andrew Pullum has violated Title 18, United States Code, Section 641.

4. This affidavit does not contain all the information I have regarding this investigation. Rather, it is for the limited purpose of establishing probable cause to arrest Andrew Pullum.

5. In August 2015, a concerned citizen provided information to the Madison Police Department that individuals, including a Madison Police Officer, were planning a robbery. After receipt of the information, the Madison Police Department Internal Affairs Division immediately contacted the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) to request assistance with the investigation. Shortly thereafter, the FBI became involved in this public corruption investigation.

6. On December 17, 2015, the FBI set up an investigative operation involving Officer Pullum. Specifically, around 9 p.m., Madison Police Department Lieutenant Kelly Donohue, who was the Officer-In-Charge for the third shift, requested that Officer Pullum make phone contact with a female -- in fact, this was an FBI undercover officer (UC) posing as a citizen providing information to the police. Officer Pullum then called the UC. The UC told Officer Pullum that she was extremely angry at her drug-dealing boyfriend and that there may be cocaine and money in a car parked down the street from the Wal-Mart on Watts Road. She further told Officer Pullum that the guys picking up the drugs use the keys hidden on the front passenger tire, grab the cocaine out of the trunk, and leave the money. Before the UC's call to Officer Pullum, an undercover vehicle was placed in a parking lot at 1250 McKenna Boulevard (Elver Park). Inside the trunk of the vehicle was \$3950 in prerecorded FBI-owned money in a green duffle bag. The green duffle bag also contained a GPS tracking device.

7. After receiving the call from the UC, Officer Pullum went to the parking lot at 1250 McKenna Boulevard. A police surveillance airplane observed Officer Pullum arrive at the parking lot and approach the undercover vehicle. After walking around the undercover vehicle, Officer Pullum grabbed the key from the front passenger tire area, opened the trunk of the undercover car, and grabbed a bag from the trunk. The only bag in the undercover car was the GPS-equipped bag containing the FBI-owned money. Airplane surveillance then observed Officer Pullum put the bag in his squad car and leave the parking lot. A short time later, Officer Pullum returned to Elver Park

and called for a drug detection canine to assist in a possible search of the undercover car.

8. Shortly thereafter, the drug canine walked around the undercover car and eventually alerted on the car. Officer Pullum, along with several other Madison Police officers, searched vehicle, but did not seize any evidence. All the officers, including Officer Pullum, then left the parking lot. Officer Pullum then went to the Madison Police Department's West District and parked his squad car in the parking lot. Airplane surveillance then observed Officer Pullum going into the West District and leaving approximately ten minutes later at the end of his shift at 10 p.m. As he was leaving the West Police Department it appeared that Officer Pullum was carrying a bag.

9. Officer Pullum then got into his personal car and drove away. The GPS device indicated that he had the duffle bag in his personal car. Airplane surveillance then observed Officer Pullum heading west on McKee Road. After several minute of driving on McKee Road, Officer Pulliam turned into a parking lot to the Ice Age National Scenic Trail Park. Once there Officer Pullum got out of the vehicle and appeared to throw something resembling a bag into a trash can. Officer Pullum then quickly left the area and proceeded east on McKee Road. The GPS device in the bag indicated that it was still at the Ice Age National Scenic Trial Park. Officer Pullum then stopped at a residence near McKee Road. Airplane surveillance observed Officer Pullum get out of his car and enter the residence. After approximately 30 minutes, Officer Pullum left the residence and proceeded to get back on McKee Road heading

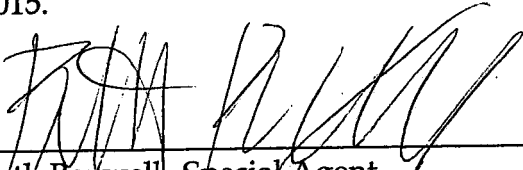
west towards Verona. At approximately 10:35 p.m., airplane surveillance observed Officer Pullum pull into his garage at 260 Meadowside Drive in Verona.

10. Around that time, law enforcement agents went to the area off of McKee Road near the Ice Age Scenic Trail Park where it appeared that Officer Pullum had thrown something into a trash can. Once there, law enforcement agents recovered the GPS-equipped green duffle bag in the trash can. The bag was empty.

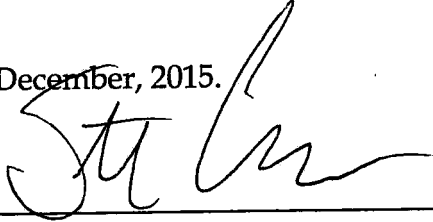
11. Detective Lieutenant Cory Nelson of the Madison Police Department Internal Affairs Division checked with Madison Police Department's Property Supervisor Lorie Anderson who advised that Pullum did not put any money into evidence from his shift on December 17, 2015. Computer records further confirmed that Officer Pullum did not log any money into evidence.

12. As set forth above, I submit there is probable cause to believe that Andrew Pullum has violated Title 18, United States Code, Section 641.

Dated this 18th day of December, 2015.


Beth Boxwell, Special Agent
Federal Bureau of Investigation

Sworn to before me this 18th day of December, 2015.


STEPHEN L. CROCKER
United States Magistrate Judge